

Exhibit 8

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

**CERTIFIED
COPY**

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NATASHA SEVERIN and GALINA
COTOVA, Individually and on
Behalf of All Others
Similarly Situated,
Plaintiffs,

No. 10 CIV 9696 (DLC)

- against -
PROJECT OHR, INC., METROPOLITAN
COUNCIL ON JEWISH POVERTY and
D'VORAH KOHN,
Defendants.

-----X
DEPOSITION OF NATASHA VITTORIA SEVERIN
New York, New York
Tuesday, September 20, 2011

Reported by:
ANNETTE ARLEQUIN, CCR, RPR
JOB NO. 41748

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4
5 September 20, 2011

6 10:04 a.m.
7

8 Deposition of NATASHA VITTORIA SEVERIN,
9 held at the offices of Mintz, Levin, Cohn,
10 Ferris, Glovsky and Popeo, P.C., 666 Third
11 Avenue, New York, New York, before Annette
12 Arlequin, a Certified Court Reporter, a
13 Registered Professional Reporter and a
14 Notary Public of the State of New York.
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2 A P P E A R A N C E S:
3

4 BERANBAUM MENKEN LLP

5 Attorneys for Plaintiffs

6 80 Pine Street, 33rd Floor

7 New York, New York 10005

8 BY: JENNIFER SMITH, ESQ.

9 jsmith@nyemployeeelaw.com
10

11 MINTZ LEVIN COHN FERRIS GLOVSKY and POPEO, P.C.

12 Attorneys for Defendants

13 Chrysler Center

14 666 Third Avenue

15 New York, New York 10017

16 BY: MICHAEL S. ARNOLD, ESQ.

17 Marnold@mintz.com

18 JENNIFER B. RUBIN, ESQ.

19 Jrubin@mintz.com
20

21 ALSO PRESENT:
22

23 GALYA KOROVINA, Russian Interpreter
24
25

1
2 IT IS HEREBY STIPULATED AND AGREED,
3 by and between the attorneys for the
4 respective parties herein, that filing
5 and sealing be and the same are hereby
6 waived

7 IT IS FURTHER STIPULATED AND AGREED
8 that all objections, except as to the form
9 of the question, shall be reserved to the
10 time of the trial.

11 IT IS FURTHER STIPULATED AND AGREED
12 that the within deposition may be sworn to
13 and signed before any officer authorized to
14 administer an oath, with the same force and
15 effect as if signed and sworn to before the
16 Court.

1 N. Severin

2 Q. I think you just said that your --
3 you said that your job description was discussed
4 partially.

5 Can you explain what you mean by
6 that?

7 A. We have many tasks and we did not
8 cover all of them.

9 Q. Do you remember asking any questions
10 about your job description at the orientation?

11 A. I don't remember.

12 Q. Ms. Severin, have you ever heard of a
13 sleep-in shift?

14 A. Yes, of course.

15 Q. Did you ever work a sleep-in shift
16 while employed at Project OHR?

17 A. Thirty-nine months.

18 Q. So is that a yes, you have worked a
19 sleep-in shift while employed at Project OHR?

20 A. Yes, thirty-nine months.

21 Q. Did you ever work another type of
22 shift while employed at Project OHR?

23 A. Of course, yes.

24 Q. What other type of shift did you
25 work?

1 N. Severin

2 A. Twelve-hour shifts, ten-hour shifts.

3 Q. Were those hourly shifts?

4 MS. SMITH: Objection.

5 A. I don't understand the question.

6 Q. When you worked the 10-hour or
7 12-hour shifts, were those shifts paid per hour?

8 A. Yes.

9 Q. Did you ever work a shift that was
10 less than 10 hours?

11 A. Yes.

12 Q. What was the fewest amount of hours
13 you would ever work in an hourly shift?

14 A. One hour 45 minutes.

15 Q. Other than the sleep-in shifts, just
16 focusing on the hourly shifts, would the hourly
17 shifts range from anywhere from 1 hour and 45
18 minutes to 12 hours?

19 A. Yes.

20 Q. Just a reminder to keep your answers
21 verbal because the reporter can't understand
22 nods.

23 THE INTERPRETER: What's the
24 question?

25 BY MR. ARNOLD:

1 N. Severin

2 Q. Okay. My question is, did the number
3 of hours you worked in shifts other than
4 sleep-in shifts vary?

5 A. Mostly it was 10 and 12 hours.

6 Q. Were there times that you worked
7 shifts less than 10 hours?

8 A. Seldom.

9 Q. Were there times that you worked the
10 shift less than nine hours?

11 A. Yes, if the agency required that.

12 Q. Did the start time of an hourly shift
13 vary from shift to shift?

14 A. Sometimes there would be a one hour
15 difference, whether it was started at 8 or at
16 9:00.

17 Q. Did you ever start an hourly shift at
18 1:00 in the afternoon?

19 A. Several times.

20 Q. When you worked an hourly shift, did
21 you ever -- withdrawn.

22 Have you ever heard of a duty-free
23 hour?

24 A. No, I know only the airport
25 duty-free.

1 N. Severin

2 Q. Good joke.

3 When you worked an hourly shift, did
4 you get an hour off for lunch?

5 A. Sometimes.

6 Q. Was there ever a week where you
7 worked just sleep-in shifts?

8 A. Such shifts lasted for months.

9 Q. My question is, was there ever a week
10 where you just worked sleep-in shifts and no
11 other shift?

12 A. You mean for this agency?

13 Q. I do.

14 A. Yes.

15 Q. Sticking with Project OHR, was there
16 ever a week where you only worked hourly shifts?

17 A. Yes.

18 Q. Was there ever a week where you
19 worked both an hourly shift and a sleep- in
20 shift?

21 A. It happened very seldom. Only in
22 cases of emergencies.

23 Q. Was there ever a week where you cared
24 for just one client?

25 A. Yes.

1 N. Severin

2 Q. Was there ever a week where you cared
3 for more than one client?

4 A. Very often.

5 Q. Was there ever a week where you cared
6 for more than one client on the same shift?

7 MS. SMITH: Objection.

8 A. There are so-called cluster cases
9 when it's husband and wife, and then sometimes
10 there were three clients.

11 Q. And you worked a shift like that
12 once?

13 A. [In English] Yes.

14 [Through the Interpreter] Several
15 times.

16 Q. How many clients would you say you
17 cared for over the course of your employment for
18 Project OHR?

19 A. I could not count.

20 Q. Do you think it was more than 50?

21 A. Much more than 50.

22 Q. Would you say it was more than 100?

23 A. Yes.

24 Q. Did another Project OHR home
25 attendant ever care for a client that you also

1
2 questions. Thank you very much for coming
3 in today. Nice to meet you.

4 (Time noted: 2:38 p.m.)
5

6
7 _____
8 NATASHA VITTORIA SEVERIN
9

10 Subscribed and sworn to before me
11 this day of 2011.
12

C E R T I F I C A T E

STATE OF NEW YORK)

) ss.:

COUNTY OF WESTCHESTER)

I, ANNETTE ARLEQUIN, a Notary Public
within and for the State of New York, do
hereby certify:

That NATASHA VITTORIA SEVERIN, the
witness whose deposition is hereinbefore
set forth, was duly sworn by me and that
such deposition is a true record of the
testimony given by such witness.

I further certify that I am not
related to any of the parties to this
action by blood or marriage; and that I am
in no way interested in the outcome of this
matter.

IN WITNESS WHEREOF, I have hereunto
set my hand this 30th day of September, 2011.



ANNETTE ARLEQUIN, CCR, RPR

100 25 hour or more hour or more for the whole procedure (didn't finish)

MAROUSSIA D. DIMITROV
NOTARY PUBLIC, State of New York
No. 01DI6031959
Qualified in Kings County
Commission Expires 10/12/2013

MY COMMISSION EXPIRES: 10/12/2013